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Donald C. Brittingham
Director – Wireless/Spectrum Policy

November 23, 2005

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

**Re: *Ex Parte* Presentation
WT Docket No. 03-103; “Air-Ground Telecommunications Services”**

Dear Ms. Dortch:

On November 22, 2005, I spoke via telephone with John Giusti, acting legal advisor to Commissioner Copps regarding the above-captioned proceeding. We discussed AirCell’s petition for reconsideration which requests that the Commission shorten the transition period for Airfone to reconfigure its current air-to-ground (“ATG”) system to operate in only 1 MHz of spectrum and terminate Airfone’s existing license in just two years.

I noted that the timeframes imposed by the Commission in its Order are already aggressive, and impose substantial burdens on Airfone and its customers. AirCell’s proposal, if adopted, would impose additional burdens and undermine competition, not promote it as AirCell suggests. Airfone urges the Commission to act expeditiously to reject AirCell’s request for reconsideration, reaffirm its earlier rules, and move quickly to auctioning the Air-Ground spectrum.

Pursuant to Section 1.1206(b)(2) of the Commission’s Rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket.

Sincerely,

/s/ Donald C. Brittingham
Donald C. Brittingham

cc: John Giusti